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February 2, 2005

VIA ELECTRONIC AND 1ST CLASS MAIL SERVICE

The Honorable Charles L.A. Terreni
Executive Director
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

RE: Application of Premier Telecom, Inc. for a Certificate of Public Convenience and Necessity to Provide Local Exchange and Resold Long Distance Telecommunications Services and for Flexible and Alternative Regulation Within the State of South Carolina
Docket No. 2004-331-C, Our File No. 977-10285

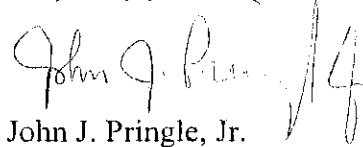
Dear Mr. Terreni:

Enclosed is the original and twenty-five (25) copies of the **Testimony of Eric Rivard** filed on behalf of Premier Telecom, Inc. in the above-referenced docket.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,



John J. Pringle, Jr.

JJP/cr

cc: Ms. Monica Munoz [via first-class mail service]
Office of Regulatory Staff [via first-class mail service]

Enclosures

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**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

APPLICATION OF PREMIER TELECOM, INC.)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO PROVIDE LOCAL EXCHANGE)
AND RESOLD LONG DISTANCE)
TELECOMMUNICATIONS SERVICES)
AND FOR FLEXIBLE REGULATION OF ITS LOCAL)
EXCHANGE SERVICES AND ALTERNATIVE)
REGULATION OF ITS LONG DISTANCE)
SERVICE OFFERINGS)

DOCKET NO. 2004-331-C

PREMIER TELECOM, INC.

Testimony of

Eric Rivard

1 **Q. Will you please state your name and business address.**

2 A. My name is Eric Rivard. My business address is 400 E. Atlantic Blvd., Suite A, Pompano
3 Beach FL 33060.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am the Director of Management Information Systems for Premier Telecom, Inc.,
7 ("Premier"). I am responsible for software development, including billing, customer service,
8 order system, and the website. I am also responsible for database development, including
9 customer and billing databases, system/architecture design and hardware support.

10 **Q. Please give a brief description of your background and experience.**

11 A. I began working for Premier in November of 2002. Prior to that date, I was employed by
12 Federated Systems Group in Duluth, Georgia, where I was a Senior Analyst, Programming,
13 and was responsible for software development, hardware support, systems/architecture
14 design, and customer support. From June of 1998 to December of 2000, I was employed by
15 ACS (formerly Consultec) in Atlanta, Georgia, where I was responsible for software
16 development, systems/architecture design, and customer support.

17 I graduated Magna Cum Laude from the University of Georgia, 1998, with a Bachelor
18 of Business Administration. I obtained a double major in Management Information Systems
19 and International Business, with a 4.0 GPA.

20 **Q. What is the purpose of your testimony?**

21 A. The purpose of my testimony is to present evidence describing the technical, managerial and
22 financial fitness of Premier to provide resold and facilities-based local telecommunications

1 services, and resold interexchange telecommunications services in South Carolina. This
2 testimony will also describe the services proposed by Premier and the proposed tariff
3 structure. Finally, the purpose of my testimony is to show that the public interest will be
4 served by approval of the application of Premier for a certificate of public convenience and
5 necessity.

6 **Q. Has Premier registered to do business in South Carolina?**

7 A. Yes. Premier received foreign corporation authority in South Carolina on October 27,
8 2004. That document was attached to the Application as Exhibit A.

9 **Q. Please explain the Company's corporate structure.**

10 A. Premier is a privately held foreign corporation incorporated on December 31, 2001. The
11 Company is incorporated under the laws of the State of Florida.

12 **Q. Please describe the services Premier proposes to offer.**

13 A. Premier will provide local exchange telecommunications services to customers throughout
14 the state using unbundled network elements ("UNEs") and resold services. Premier intends
15 to provide local exchange services, custom calling and CLASS features and unbundled
16 services such as local and long distance services in a combined package. In addition, the
17 Company will provide to its Customers additional custom calling and class features, access
18 to emergency call services (e.g. 911), directory assistance and other ancillary services.
19 Applicant also proposes to offer resold inbound and outbound interexchange
20 telecommunications services.

21 **Q. Does Premier own any network switches or transmission facilities used in routing calls?**

22 A. No.

1 **Q. How will Premier bill for its services?**

2 A. Calls are billed directly by the Company. In conformance with Commission Rule 103-622.1,
3 invoices will contain the following information: description of services, charges, Premier's
4 name, and its toll free telephone number for customer assistance.

5 **Q. How are trouble reports handled?**

6 A. Premier utilizes a nationwide toll-free number 877-214-1343 for customer service. The toll-
7 free number will be printed on the customers' monthly billing statements. Customers may
8 access a live customer service representative 24 hours a day, seven days a week. In addition,
9 customers may contact the company in writing at the headquarters address and via email at
10 Eduardo@premiertelecominc.com.

11 **Q. How are billing errors and complaints handled?**

12 A. Premier utilizes a nationwide toll-free number, 877-214-1343, for customer service.
13 Customers may also contact the Company via mail at the headquarters location, or via email
14 at Eduardo@premiertelecominc.com.

15 **Q. Does Premier utilize scripts or engage in the practice of telemarketing to sell its**
16 **services?**

17 A. No. Premier does not utilize telemarketers in order to market its services. Premier uses a
18 network of agents to market its services and will receive inbound calls from prospective
19 customers. Premier obtains written letters of agency from all of its customers. Premier will
20 comply with all state and federal telecommunications statutes, rules or regulations governing
21 the processing, verification and implementation of customer-ordered changes.

22

1 **Q. Describe the proposed Premier South Carolina tariffs.**

2 A. Premier has included proposed tariffs that contain the rules, regulations and rates for
3 Premier's local and interexchange services. Premier proposes to resell interexchange
4 telecommunications services including travel service available through toll-free access. The
5 Company's local exchange services tariff provides descriptions and rates for local exchange
6 services, including custom calling features.

7 **Q. Does Premier provide operator services?**

8 A. Yes, only to its presubscribed customers.

9 **Q. Describe Premier's financial ability to operate as a telecommunications provider.**

10 A. Premier has ample capital to provide the services for which authority is requested. Premier
11 provided its Balance Sheet and Profit & Loss Statement as proof of its financial stability to
12 provide the required services within the State of South Carolina. This information is attached
13 and labeled for identification purposes as Exhibit B of the company's Application.

14 **Q. Do you believe Premier is capable of delivering its proposed services in South Carolina?**

15 A. Yes, in addition to having sufficient financial resources, the senior management team of
16 Premier has a varied and detailed background in telecommunications. The Company has the
17 managerial experience in the telecommunications industry that will allow it to be a successful
18 competitive local exchange and toll provider.

19 **Q. Where in South Carolina does Premier intend to offer its services and how will those
20 services be offered?**

21 A. Premier intends to offer facilities-based local telecommunications service via UNEs and
22 resold interexchange telecommunications service throughout the present operating areas of

1 BellSouth and long distance service will be offered throughout the State of South Carolina.

2 **Q. Where will the records pertaining to your South Carolina operations be kept?**

3 A. Premier will keep these records at its offices in Pompano Beach, FL. Accordingly, Premier
4 requests, pursuant to Commission Rule 103-610, that the Commission allow Premier to keep
5 its records at the above-referenced address. I can assure this Commission that Premier will
6 provide expeditiously any and all applicable records that may be requested by the
7 Commission.

8 **Q. Is Premier prepared to comply with South Carolina law and with all applicable**
9 **rules and regulations of the Commission?**

10 A. Yes, it is.

11 **Q: Will the Company file all applicable reports as required by the Commission?**

12 A: Yes. The Company is aware of the Commission's requirements that all telecommunications
13 carriers file a report on South Carolina operations, a gross receipts report, and a universal
14 service contribution report on an annual basis.

15 **Q. How will South Carolina consumers benefit from Premier's services?**

16 A. Granting Premier's application will introduce a telecommunications service provider
17 committed to providing high quality, innovative, and technologically advanced services that
18 will further increase telecommunications competition within the State of South Carolina.
19 Premier's network will utilize state-of-the art technology. Premier's service offerings will
20 increase consumer choice, improve the quality and efficiency in telecommunications services
21 and will likely lead to the reduction of consumer costs, as well as stimulate development of
22 additional services by providing competitive incentives to other providers. Thus, granting

1 Premier's application is in the public interest.

2 **Q. Does this conclude your testimony?**

3 **A. Yes.**